

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	Title	Mr
First Name	Alastair	First Name	Paul
Last Name	Stewart	Last Name	Hill
Job Title (where relevant)	Planning Manager	Job Title (where relevant)	Senior Director - Planning
Organisation (where relevant)	Persimmon Homes WM	Organisation (where relevant)	RPS
Address Line 1		Address Line 1	4 th Floor, 1 Newhall St.
Line 2		Line 2	Birmingham
Line 3		Line 3	
Line 4		Line 4	



Post Code

Telephone Number

E-mail Address (where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy DS4 (Development Needs) establishes a housing target of a minimum of 9,089 dwellings to be delivered between 2018 and 2039. This comprises 5,089 dwellings to meet local housing needs of South Staffordshire, and 4,000 dwellings towards the unmet need of the Greater Birmingham and Black Country Housing Market Area.

Housing Need and Employment Growth

However, it is unclear whether other relevant factors, including employment growth in the District, have been taken into account in determining the appropriate minimum level of housing need to be provided for in the SSLP. Planning Practice Guidance¹ identifies those circumstances that might justify a higher housing need figure than the standard method would indicate. This is because the standard

¹ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

method does not attempt to predict the impact that future government policies, changing economic circumstances, or what impacts other factors might have on demographic behaviour. This covers a range of factors, including '*growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*'. This would include major new employment investment in the District that is not accounted for when projecting forward future housing need.

One such example is of relevance in South Staffordshire, notably the proposals to deliver the West Midlands Interchange (WMI) at Four Ashes. This site is allocated in the SSLP, under Policy SA7, with an expectation that 232.5 hectares of employment development will be delivered at the WMI by 2039. This scheme is also expected to deliver around 8,550 jobs in the District². Paragraph 4.56 of the Preferred Options Document acknowledged that the WMI:

"...significantly increases the known oversupply of employment land in South Staffordshire, and with this, the scope to contribute towards unmet needs elsewhere in the FEMA..."

The total supply of employment land in South Staffordshire is estimated to be at least 327.9 hectares (see Table 9 of the SSLP), including WMI. This is against an estimated employment land need in the District of 63.6 hectares (see paragraph 6.41 of the SSLP). The estimated over-supply of employment land available in the District is therefore in the region of 264.3 hectares. Of this surplus, around 103.6 ha is 'claimed' by the Black Country to meet cross boundary needs, comprising 67 ha from WMI and 36.6ha from other strategic sites allocated in the SSLP under Policy SA7 (see Table 9 / paragraph 5.62 of the SSLP). This leaves around 160.7 ha of surplus employment land. Of the 232.5 ha of employment land at WMI, 18.8ha is also attributed to meeting South Staffordshire's labour demand (see Table 9, footnote ** of the SSLP). When accounting for this, the residual surplus of employment land allocated in the SSLP is still 141.9 hectares and which is not anticipated to meet either local employment need nor address the unmet employment needs from the Black Country.

The substantial over-allocation of employment land in the SSLP, including that resulting from the WMI project, will need an additional labour supply to fill the new jobs provided. The Council's employment evidence suggest that the additional jobs, including those provided at WMI, will be met by the existing South Staffordshire labour force through either reduced unemployment or reduced out-commuting (see Economic Development Needs Assessment 2020-2040, June 2022, paragraph 0.56). However, it remains unclear whether the potential impact on the demand for housing within the District, as a result of the jobs growth required to support the over-supply of employment, has been taken into account in determining the minimum local housing need figure now proposed in the SSLP. From the review of the published evidence undertaken by RPS, this appears not to be the case. Without clarity on this matter, the proposed housing target in the SSLP is not justified and so is not soundly-based.

² West Midlands SRFI Employment Issues Response Paper – Labour Supply, Stantec, May 2020

RPS therefore recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and consider the implications on housing demand of the significant level of over-supply of employment land identified in the SSLP.

Unmet need from neighbouring areas

In addition, in line with our objections to Strategic Objective 2 under the plan vision, RPS contends that a soundly-based contribution towards unmet need should be increased to at least 4,200 dwellings. Furthermore, the Council continues to rely on the GBBCHMA Strategic Growth Study (SGS) published in February 2018 as a basis for the 4,000 dwelling figure. This is confirmed at paragraph 5.16 of the SSLP. The Strategic Growth Study (SGS) was published in February 2018, and covered need and supply of housing across the Greater Birmingham HMA up to 2036. The Council acknowledges that events have moved on since this SGS was published, notably the emergence of a substantial level of unmet housing need identified in the Black Country, totalling 28,239 dwellings up to 2039 once all sources of supply within the conurbation have been identified³. The scale of unmet need is higher than previous estimates, based in part on higher estimates of housing need for the Black Country (using on the standard method and 35% urban centres uplift) and lower estimates of supply from land within the existing built-up area. Similarly, the scale of the shortfall is not only significant in scale but also extends beyond the end date of the SGS (2036) by three additional years, to 2039. This new and evolving position should be fully accounted for in the proposed redistribution of unmet need from the Black Country to the District.

Similarly, other relevant information (including data migration and commuting flows between the District and the Black Country) has been ignored in favour of the focus solely on the SGS as the basis for the scale of the redistribution. RPS contend that other data sources should be taken into account and which indicate that the contribution should be higher than 4,000. In terms of migration flows, figures from Office for National Statistics (ONS) show that in 2020⁴, the most recent dataset available, 80% of the moves from other authorities in the GBBCHMA (excluding Birmingham) into the District were from the four Black Country Authorities. This was the highest of all the authorities in the HMA (the next highest was Bromsgrove, at 52% of moves). Similarly, in terms of commuting flows, ONS data shows that South Staffordshire again exerts a strong influence over journeys between the District and the Black Country. The latest commuting data remains the Census 2011⁵, which shows that of the total journeys out of the District to a place of work within the GBBCHMA (excluding Birmingham) 80% were to the Black Country. This was significantly higher than the next highest area, which was from Cannock Chase (at 46%). This analysis illustrates the strength of the functional relationship between South Staffordshire and the Black Country. In contrast, the proportion of the total unmet need from the Black Country being met in South Staffordshire is

³ Draft Black Country Plan 2039 (Regulation 18) August 2021, paragraph 3.21

⁴ ONS, Internal migration - Matrices of moves between English and Welsh local authorities, English regions, Scotland and Northern Ireland, year ending June 2020

⁵ WU01UK - Location of usual residence and place of work by sex



just 14%. RPS contends that the quantum of unmet need has been suppressed due to the over-reliance on the SGS as the sole basis for the 4,000 redistribution figure and, as a result, does not reflect other relevant factors, notably the functional relationship between the two areas. On this basis, RPS does not consider the 4,000 to be justified on the evidence and information available and so is not soundly-based.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

RPS recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and consider the implications on housing demand of the significant level of over-supply of employment land identified in the SSLP.

Increase the proportionate contribution to the unmet need from the GBBCHMA to at least 4,200 dwellings on the basis that the plan period has been extended forward by one year in line with the local housing need increase.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

RPS has raised specific issues and concerns through this representation that goes to the soundness of the SSLP and it is essential these concerns and the councils evidence is fully tested.

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX